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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$24,000.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:21-MC-00041-WBS-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant
18 Bradley Hoderny (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 23, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$24,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 1, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a
25 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline was February 19, 2021.

3 4. By Stipulation and Order filed February 16, 2021, the parties stipulated to extend to April
4 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. By Stipulation and Order filed April 16, 2021, the parties stipulated to extend to June 18,
8 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. By Stipulation and Order filed June 14, 2021, the parties stipulated to extend to August
12 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 7. By Stipulation and Order filed August 16, 2021, the parties stipulated to extend to October
16 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 8. By Stipulation and Order filed October 15, 2021, the parties stipulated to extend to
20 November 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
22 subject to forfeiture.

23 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
24 December 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture
25 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
26 subject to forfeiture.

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1 9. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to December 15, 2021.

4 Dated: 11/12/21

PHILLIP A. TALBERT
Acting United States Attorney


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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

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8 Dated: 11/11/21

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Bradley Hoderny
(Signature authorized by email)

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13 **IT IS SO ORDERED.**

14 Dated: November 15, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE